

EXHIBIT 16

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Walters v. City of Flint et al.,

No. 5:17-cv-10164

Hon. Judith E. Levy

**BELLWETHER III PLAINTIFFS' REQUEST FOR PRODUCTION OF
DOCUMENTS TO DEFENDANTS VEOLIA NORTH AMERICA, INC.,
VEOLIA NORTH AMERICA OPERATING SERVICES, LLC, VEOLIA
NORTH AMERICA, LLC, VEOLIA WATER LOGISTICS, LLC, VEOLIA
WATER MUNICIPAL SERVICES NORTH AMERICA, LLC, VEOLIA
WATER NORTH AMERICA OPERATING SERVICES, LLC**

Pursuant to Federal Rule of Civil Procedure 34(a), Bellwether III Plaintiffs hereby request that Defendants Veolia North America, Inc., Veolia North America Operating Services, LLC, Veolia North America LLC, Veolia Water Logistics, LLC, Veolia Water Municipal Services North America, LLC, Veolia Water North America Operating Services, LLC (collectively “Veolia,” or “VNA Defendants,” or “Veolia Defendants”) produce all of the following documents and tangible things for inspection and copying or photographing at the offices of LEVY KONIGSBERG, LLP, 605 Third Avenue, 33rd Floor, New York, New York 10158 on October 24, 2021.

The following instructions and definitions shall apply to each and every part of this Request as if fully set forth therein:

INSTRUCTIONS

1. Defendant Veolia must respond to each of the following Requests separately and fully.
2. Each Request shall be construed independently and not with reference to any other Request for the purpose of limitation.
3. If Defendant Veolia withholds any information called for by a Request on the basis of a claim or privilege or attorney work product, Defendant Veolia shall furnish a list setting forth, as to each objection, the nature of the privilege that is being claimed.
4. Each Request shall be deemed continuing so as to require prompt, supplemental responses if Defendant Veolia obtains or discovers further information called for herein between the time of responding to these Requests and the time of trial.
5. If any documents or tangible things are produced in response to these Requests, indicate for each Request, by Bates numbers or their equivalent, the documents or things that are responsive to that Request.
6. Unless otherwise stated or obvious from the context, the Requests herein cover the period from January 1, 2015 through the present.
7. As specified by Federal Rule of Civil Procedure 34(b)(2)(E), if responsive material is in electronic, magnetic, or digital form, Plaintiffs

specifically requests production of such material pursuant to the protocol previously implemented by the Court.

8. In the event an objection is made as to any specific request, nevertheless, respond to all portions of the Request that do not fall within the scope of the objection. For example, if a Request is objected to on the grounds that it is too broad, insofar as it seeks information covering years Defendant believes are not relevant to this litigation, nevertheless, provide information for all years which Defendant concedes are relevant. See Federal Rules of Civil Procedure 33(b)(3) and 34 (b)(2)(C).

GENERAL DEFINITIONS

As used in these requests, the following terms mean:

1. Communication. The term “communication” means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).

2. Document. The term “document” is defined to be synonymous in meaning and equal in scope to the usage of the term “documents” or “electronically stored information” in Fed. R. Civ. P. 34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of this term.

3. Identify (with respect to persons). When referring to a person, “to identify” means to give, to the extent known, the person’s full name, present or last known address, and when referring to a natural person, additionally, the

present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

4. Identify (with respect to documents). When referring to documents, “to identify” means to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), addressee(s) and recipient(s). In the alternative, the responding party may produce the documents, together with identifying information sufficient to satisfy Fed. R. Civ. P. 33(d).

5. Parties. The terms “plaintiff” and “defendant” as well as a party’s full or abbreviated name or a pronoun referring to a party mean the party and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates. This definition is not intended to impose a discovery obligation on any person who is not a party to the litigation.

6. Person. The term “person” is defined as any natural person or any legal entity, including, without limitation, any business or governmental entity or association.

7. Concerning. The term “concerning” means relating to, referring to, describing, evidencing or constituting. The following rules of construction apply to all discovery requests:

- (1) All/Any/Each. The terms “all,” “any,” and “each” shall each be construed as encompassing any and all.
- (2) And/Or. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
- (3) Number. The use of the singular form of any word includes the plural and vice versa.

NOTE

Plaintiffs remind the VNA Defendants of their obligation to produce not only documents that are within their actual possession but also those that are within their control, including those which they have a legal or contractual right to obtain from the person with actual possession or custody of them and those which they can make available to Plaintiffs by providing a suitable authorization for release of them to Plaintiffs’ Counsel. These requests shall all be understood to seek not only hard copy documents but also electronically kept documents.

REQUESTS

REQUEST NO. 1:

All documents/tangible things related to Rise Strategy Group's ("Rise") relationship with the Veolia Defendants, in conjunction with the Flint Water Crisis and Flint Water Crisis Litigation.

REQUEST NO. 2:

All communications between Rise and the Veolia Defendants since January 1, 2015, including all text messages between anyone from Veolia (or anyone acting on Veolia's behalf), and anyone from Rise.

REQUEST NO. 3:

All documents/tangible things related to Mercury Public Affairs' (Mercury) relationship with the Veolia Defendants in conjunction with the Flint Water Crisis and Flint Water Crisis Litigation.

REQUEST NO. 4:

All communications between Mercury Public Affairs and the Veolia Defendants since January 1, 2015, including all text messages between anyone from Veolia (or anyone acting on Veolia's behalf), and anyone from Mercury.

REQUEST NO. 5:

All documents/tangible things related to Tarrah Cooper Wright's ("Wright") relationship with the Veolia Defendants in conjunction with the Flint Water Crisis and Flint Water Crisis Litigation.

REQUEST NO. 6:

All communications between Wright and the Veolia Defendants since January 1, 2015, including all text messages between anyone from Veolia (or anyone acting on Veolia's behalf), and Wright.

REQUEST NO. 7:

All documents/tangible things related to Tiger Joyce's ("Joyce") relationship with the Veolia Defendants in conjunction with the Flint Water Crisis and Flint Water Crisis Litigation.

REQUEST NO. 8:

All communications between Joyce and the Veolia Defendants since January 1, 2015, including all text messages between anyone from Veolia (or anyone acting on Veolia's behalf), and Joyce.

REQUEST NO. 9:

All documents/tangible things related to The American Tort Reform Association's ("ATRA") relationship with the Veolia Defendants in conjunction with the Flint Water Crisis and Flint Water Crisis Litigation.

REQUEST NO. 10:

All communications between ATRA and the Veolia Defendants since January 1, 2015, including all text messages between anyone from Veolia (or anyone acting on Veolia's behalf), and anyone from ATRA.

REQUEST NO. 11:

All documents/tangible things related to Bailey Griffith Aragon's ("Aragon") relationship with the Veolia Defendants in conjunction with the Flint Water Crisis and Flint Water Crisis Litigation.

REQUEST NO. 12:

All communications between Aragon and the Veolia Defendants since January 1, 2015, including all text messages between anyone from Veolia (or anyone acting on Veolia's behalf), and Aragon.

REQUEST NO. 13:

All documents/tangible things related to Rasky Partners' ("Rasky") relationship with the Veolia Defendants in conjunction with the Flint Water Crisis and Flint Water Crisis Litigation.

REQUEST NO. 14:

All communications between Rasky and the Veolia Defendants since January 1, 2015, including all text messages between anyone from Veolia (or anyone acting on Veolia's behalf), and Rasky.

REQUEST NO. 15:

All documents/tangible things related to Jonathan Karush's ("Karush") relationship with the Veolia Defendants in conjunction with the Flint Water Crisis and Flint Water Crisis Litigation.

REQUEST NO. 16:

All communications between Karush and the Veolia Defendants since January 1, 2015, including all text messages between anyone from Veolia (or anyone acting on Veolia's behalf), and Karush.

REQUEST NO. 17:

All documents/tangible things related to Hillary Ziegenhagen's ("Ziegenhagen") relationship with the Veolia Defendants in conjunction with the Flint Water Crisis and Flint Water Crisis Litigation.

REQUEST NO. 18:

All communications between Ziegenhagen and the Veolia Defendants since January 1, 2015, including all text messages between anyone from Veolia (or anyone acting on Veolia's behalf), and Ziegenhagen.

REQUEST NO. 19:

All documents/tangible things related to Frost Prioleau's ("Prioleau") relationship with the Veolia Defendants in conjunction with the Flint Water Crisis and Flint Water Crisis Litigation.

REQUEST NO. 20:

All communications between Prioleau and the Veolia Defendants since January 1, 2015, including all text messages between anyone from Veolia (or anyone acting on Veolia's behalf), and Prioleau.

REQUEST NO. 21:

All documents/tangible things related to Simpli.Fi's relationship with the Veolia Defendants in conjunction with the Flint Water Crisis and Flint Water Crisis Litigation..

REQUEST NO. 22:

All communications between Simpli.Fi and the Veolia Defendants since January 1, 2015, including all text messages between anyone from Veolia (or anyone acting on Veolia's behalf), and anyone from Simpli.Fi.

REQUEST NO. 23:

All text messages, chat logs, and emails to or from Marvin Gnagy, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;
- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;

- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;
- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 24:

All text messages, chat logs, and emails to or from Rob Nicholas, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;
- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;
- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;

- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 25:

All text messages, chat logs, and emails to or from Depin Chen, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;
- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;
- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;
- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 26:

All text messages, chat logs, and emails to or from David Gadis, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;
- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;
- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;
- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 27:

All text messages, chat logs, and emails to or from William Fahey, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;

- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;
- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;
- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 28:

All text messages, chat logs, and emails to or from Brian Clarke, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;
- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;

- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;
- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 29:

All text messages, chat logs, and emails to or from Frederic Van Heems, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;
- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;
- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;

- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 30:

All text messages, chat logs, and emails to or from Dennis Chesseron, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;
- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;
- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;
- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 31:

All text messages, chat logs, and emails to or from Keith Oldewurtel, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;
- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;
- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) LeeAnne Walters;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;
- (t) Dr. Edward Hoffman;
- (u) Counsel for the Bellwether I plaintiffs;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 32:

All text messages, chat logs, and emails to or from Jim Pawloski, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;

- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;
- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;
- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 33:

All text messages, chat logs, and emails to or from Karine Rouge, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;
- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;

- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;
- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 34:

All text messages, chat logs, and emails to or from Joseph Nasuta, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;
- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;
- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;

- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 35:

All text messages, chat logs, and emails to or from Matt Demo, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;
- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;
- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;
- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 36:

All text messages to or from Carrie Griffiths, between January 1, 2015 and present, which discuss:

- (a) the Flint Water Crisis;
- (b) Veolia's work in Flint;
- (c) Veolia's proposed scope of work in Flint;
- (d) the litigation associated with the Flint Water Crisis;
- (e) LAN and/or LAD;
- (f) water test results related to the University of Michigan, Flint Campus;
- (g) crisis management related to the Flint Water Crisis;
- (h) Veolia's Business Development;
- (i) the City of Flint;
- (j) the State of Michigan;
- (k) the Governor of the State of Michigan;
- (l) Richard Humann;
- (m) Dr. Larry Russell;
- (n) Warren Green;
- (o) Jeff Hansen;
- (p) Counsel for Plaintiffs;
- (q) Dr. Aaron Specht;
- (r) Dr. William Bithoney;
- (s) Dr. Mira Krishnan;
- (t) Dr. Edward Hoffman;
- (u) LeeAnne Walters;
- (v) the Honorable Judith E. Levy;
- (w) Rowe Professional Services Company;
- (x) the partial settlement approved by the Honorable Judith E. Levy;
- (y) Melvin Jones; and
- (z) Colleen Connors

REQUEST NO. 37:

All documents pertaining to Veolia's internal investigation(s) into its own conduct related to the Flint Water Crisis.

REQUEST NO. 38:

All documents pertaining to Veolia's internal investigation(s) into its own conduct related to its work with the Pittsburgh Water and Sewer Authority, which resulted in a lawsuit filed against Veolia in 2016.

REQUEST NO. 39:

All documents pertaining to Veolia's work in Plymouth, MA, which resulted in a lawsuit filed by the Massachusetts Attorney General against Veolia in 2016.

REQUEST NO. 40:

All documents pertaining to Veolia's internal investigation(s) into its own conduct related to its work in Plymouth, MA, which resulted in a lawsuit filed by the Massachusetts Attorney General against Veolia in 2016.

Dated: September 26, 2022

Respectfully submitted,

/s/ Corey M. Stern

Corey M. Stern

LEVY KONIGSBERG LLP

605 Third Ave., 33rd Fl.

New York, New York

(212) 605-6200

cstern@levylaw.com

CERTIFICATE OF SERVICE

I, Corey Stern, hereby certify that on September 26, 2022 the foregoing pleading was served on the Veolia entities, as well as on all counsel of record, via email.

LEVY KONIGSBERG, LLP

/s/ COREY M. STERN

Corey M. Stern
605 3rd Avenue, 33rd Floor
New York, New York 10158
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cstern@levylaw.com